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March 12, 2021

MEMO ENDORSED

VIA ECF

Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

Re: Abromavage v. Deutsche Bank Securities Inc, et al., 18-cv-06621 (VEC)

Dear Judge Caproni:

We represent Plaintiff in the above-referenced matter. In accordance with the Court's February 23, 2021 Order (ECF No. 84), we respectfully submit revised versions of certain documents initially filed in connection with Plaintiff's Opposition to Defendants' Motion for Summary Judgment, limiting the redactions of investigative material to entries that could reasonably be used to determine the identity of non-party interviewees.

In particular, the following revised documents are annexed hereto:

- Plaintiff's Rule 56.1 Counter-Statement of Disputed and Undisputed Material Facts in Opposition to Defendants' Motion for Summary Judgment (ECF No. 72)
- Exhibit 19 to the Declaration of Andrew Goodstadt (ECF No. 74-19);
- Exhibit 23 to the Declaration of Andrew Goodstadt (ECF No. 74-23);
- Exhibit 26 to the Declaration of Andrew Goodstadt (ECF No. 74-26);
- Exhibit 27 to the Declaration of Andrew Goodstadt (ECF No. 74-27);



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- Exhibit 55 to the Declaration of Andrew Goodstadt (ECF No. 74-55);
- Exhibit 56 to the Declaration of Andrew Goodstadt (ECF No. 74-56);
- Exhibit 57 to the Declaration of Andrew Goodstadt (ECF No. 74-57);
- Exhibit 58 to the Declaration of Andrew Goodstadt (ECF No. 74-58);
- Exhibit 59 to the Declaration of Andrew Goodstadt (ECF No. 74-59).

We thank the Court of its continued attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'George Vallas'.

George Vallas

Plaintiff and Defendants' revised requests to seal are hereby GRANTED. *See* Dkts. 87, 88. The narrower redactions comply with the strong presumption of public access that applies to judicial documents, such as those at issue here. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006).

Encl.

The Clerk of Court is respectfully directed to close the open motion at docket entry 87.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Valerie Caproni'.

Date: March 15, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE